

EXHIBIT G

Margetta Langlois
Volume 2 - May 19, 2005

Page 204

1 to the --

2 A. Over the phone.

3 Q. Have you ever submitted an application or
4 form to an insurance carrier to cover you for breast
5 implant removal surgery?

6 A. They don't do it.

7 Q. Please, it's a yes or no question.

8 A. No. I want to see where they pay for it.

9 Q. In Exhibit Number 17 there's a letter of
10 Dr. Matheson that references a surgery to take place
11 on June 2nd. The date of this letter is May 19.

12 A. I had it faxed up to me.

13 Q. My question is, when did you first schedule
14 this surgery?

15 A. What date did I write the check out?

16 There's a copy of the check in there too.

17 MS. POPE: Can I ask for clarification?

18 A. I had asked numerous times. I had to
19 cancel the operations. If you talk to him, he will
20 give you all the information. I have nothing to
21 hide.

22 Q. This surgery is scheduled for June 2nd?

23 A. June 2nd.

24 Q. My question is, when did you first schedule

Margetta Langlois
Volume 2 - May 19, 2005

Page 205

1 the June 2nd surgery?

2 A. There's a check on there. We talked about
3 it a week or two before that.

4 That was the one I had to cancel. When
5 was that operation?

6 Q. This is a check in Exhibit 36, the second
7 page of Exhibit 36, that's dated December 14, 2004.

8 A. That's the first time I sent the check in
9 to be operated on. I couldn't come up with the
10 other 4,000. So I cancelled it. There's numerous
11 times that I cancelled. The one now, there's one
12 for 5,000. Where is it?

13 MS. POPE: I want to hear the question.
14 I don't know what the question is.

15 Q. My question is Exhibit 17 references a
16 surgery to take place on June 2nd.

17 A. 5/13. Right here.

18 Q. My question is, when was the first time
19 that you scheduled this surgery to take place on
20 June 2nd?

21 A. It was before 5/13. If you read this, it
22 has everything in here.

23 Q. When is it, then --

24 A. Somewhere in May.

Margetta Langlois
Volume 2 - May 19, 2005

Page 206

1 Q. Please, let me finish. We are not going to
2 get done today as it is. I want to get done as much
3 as we can.

4 A. We've got to get done today.

5 Q. When was the first time --

6 A. May.

7 Q. Please, let me finish.

8 MS. POPE: He's got to get the question
9 out.

10 Q. When is the first time that you scheduled
11 with Dr. Matheson for a breast implant removal
12 surgery to take place on June 2nd?

13 A. May 13th.

14 Q. Now, you've referenced that you had had
15 other surgeries scheduled to take place with
16 Dr. Matheson that you had to cancel?

17 A. Yes.

18 Q. How many times did you have a surgery
19 scheduled with Dr. Matheson that you had to cancel?

20 A. I would say at least four or five.

21 Q. And do you recall when the first time was
22 that you had a surgery scheduled with Dr. Matheson
23 that you had to cancel?

24 A. It was in 2003, I think.

Margetta Langlois
Volume 2 - May 19, 2005

Page 207

1 Q. Is that referenced anywhere in
2 Dr. Matheson's records?

3 A. I would think. Talk with Jeannie. She
4 would be the one to talk to.

5 Q. You've handed me what we've marked as
6 Exhibit 36, what you've purported to be
7 Dr. Matheson's records. It doesn't reference any
8 other surgery in his records. Am I correct?

9 A. No, it doesn't. You can ask how many times
10 I cancelled. It started -- the first time was May
11 of 2003, I think. May of 2003. Or September of
12 2003. It was in there. June. Somewhere between
13 May and September of '03. She should have it on
14 record.

15 Q. Is it fair to say in regard to the four or
16 five times that you referenced that you had surgery
17 scheduled -- I'll make a statement here. You can
18 tell me if I'm wrong -- the reason you cancelled
19 each of the four or five surgeries was directly
20 because of your financial situation?

21 A. Yes, and the insurance wouldn't pay to have
22 it done in a hospital. I'm nervous to have it done
23 in an office, if you want to know the truth. I am.
24 If I could get it done in the hospital, for the few

Margetta Langlois
Volume 2 - May 19, 2005

Page 208

1 hours I need in the hospital, you book it, I'll go.

2 In Tampa it has to be.

3 Q. I recall doing discovery in this case that
4 you had a surgery scheduled with a doctor and you
5 cancelled because you didn't want to go to his
6 office. Was that Dr. Matheson?

7 A. That's the same doctor. I'm going to have
8 to have it done. They want 2,000 more for the
9 hospital.

10 Q. The same doctor that you weren't willing to
11 go to because you didn't want to have the surgery
12 take place in his office, you are now going to go
13 ahead and have the surgery take place --

14 A. Yes.

15 Q. -- with this doctor?

16 A. Yes.

17 Q. But the surgery is taking place in the
18 hospital?

19 A. No.

20 Q. It will take place in his office?

21 A. Yes.

22 Q. Has Dr. Matheson indicated to you any
23 medically necessary reason as to why this surgery
24 must take place on June 2, 2005?

Margetta Langlois
Volume 2 - May 19, 2005

Page 209

1 A. No.

2 Q. Was it at your request that the surgery
3 take place on June 2, 2005?

4 A. That's like one of the openings he had,
5 yes. He only operates -- he's a very busy man.

6 Q. Is it fair to say that Dr. Matheson had
7 other dates that were available as well?

8 A. I don't know.

9 Q. Did you look into whether or not
10 Dr. Matheson had other dates?

11 A. I don't know. No, I don't know. That's
12 the time that I thought I was going to go. I can't
13 keep saying yeah I'm going to go and then not show
14 up. You know what they told me? They can't keep
15 booking me. Ask Jeannie.

16 Q. Please, please. We are not going to get
17 done as it is.

18 A. I was supposed to go in when we had the
19 court hearing. Oh, we are going to get done. Trust
20 me.

21 Q. My question is a simple question.

22 A. That's when we were having the court
23 hearing.

24 Q. We are not going to get done.

Margetta Langlois
Volume 2 - May 19, 2005

Page 210

1 A. I'm getting aggravated and I can't deal
2 with the stress.

3 Q. When you scheduled this appointment, did
4 you inquire of Dr. Matheson --

5 A. No.

6 Q. Please let me finish.

7 A. If you want to get this done. No.

8 Q. I haven't finished my question yet. You're
9 making this longer than it needs to be. I don't
10 thing the court reporter is getting down this
11 testimony and we are going to have to come back and
12 do the whole thing over again.

13 My question is simple, very simple.
14 When you scheduled this surgery to take place on
15 June 2nd, you testified earlier that you scheduled
16 it on May 13th, did you inquire of Dr. Matheson or
17 his scheduling nurse or whoever you scheduled this
18 appointment with as to whether or not Dr. Matheson
19 had any other dates available?

20 A. No, I did not. You have to ask to go into
21 the hospital? That's ridiculous.

22 (Marked, Exhibit 38.)

23 Q. You just brought up a good point. I
24 believe you just stated that you could have

Margetta Langlois
Volume 2 - May 19, 2005

Page 211

1 had your implants removed years ago --

2 A. Yes.

3 Q. -- had information been supplied to Dow
4 Corning.

5 A. Yes.

6 Q. Is that an accurate statement?

7 A. By you people. I would have gotten my
8 money a year ago.

9 Q. It's a yes or no question.

10 A. It is not yes or no. I could have had my
11 money a year ago.

12 MS. POPE: Margetta, we are going to
13 take a break.

14 THE WITNESS: According to the grid, I
15 could have had my money a year ago.

16 MS. POPE: I'm going to take my client
17 out into the hall.

18 (The witness and counsel leave the room
19 to confer.)

20 Q. You referenced earlier that when you
21 submitted your forms to Dow Corning, you received
22 some documents that you haven't brought with you
23 today that you agreed to produce from the Explant
24 Assistance Program that you faxed to your doctor.

Margetta Langlois
Volume 2 - May 19, 2005

Page 212

1 Was that Dr. Matheson?

2 A. Yes, it is.

3 Q. What happened as a result, if you know?

4 A. He's not waiting for his money. He wants
5 the money up front.

6 Q. Did you attempt to provide that
7 documentation to any other doctor?

8 A. No. You had a doctor up here that was
9 going to charge 25,000.

10 MS. POPE: Margetta, I just want you to
11 answer the questions. Just answer the questions
12 that he asks you.

13 Q. I'm going to go back to the document
14 request. I'll ask you which documents you have
15 produced today here with you in response to Document
16 Request Number 5. Document Request Number 5 states,
17 for the record: "Documents that identify, refer to,
18 comment on, or constitute the factual basis of your
19 assertion in Paragraph 10 of your complaint that the
20 defendants, 'failed to file case in a proper manner
21 for deadline (in 2003) to collect monies.'"

22 My question is, what documents have you
23 brought with you today that establish that the
24 defendants failed to file the case in a proper